

PRESENTMENT DATE AND TIME: May 14, 2010 at 12:00 noon (Eastern Time)
OBJECTION DEADLINE: May 12, 2010 at 4:00 p.m. (Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re Chapter 11

MOTORS LIQUIDATION COMPANY, *et al.*, Case No. 09-50026 (REG)
(f/k/a General Motors Corp., *et al.*)

Debtors. (Jointly Administered)
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**NOTICE OF PRESENTMENT FOR ENTRY OF STIPULATION
BETWEEN ZINN COMPANY, INC. AND GENERAL MOTORS LLC**

PLEASE TAKE NOTICE that Zinn Company, Inc. ("Dealer") will present the annexed Stipulation and Agreed Order between the Dealer and General Motors LLC ("GM") (the "Stipulation"), settling all Dealer's claims as more fully set forth in the Stipulation, to the Honorable Robert E. Gerber, United States Bankruptcy Judge, for approval and signature at Room 621 of the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court"), Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004 on **May 14, 2010 at 12:00 noon (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Stipulation must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the

Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 300 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Honigman Miller Schwartz and Cohn LLP, attorneys for General Motors, LLC, 660 Woodward Avenue, 2290 First National Building, Detroit, MI 48226-3506 (Attn: Joseph Sgroi, Esq.); (v) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (vi) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, DC 20220 (Attn: Joseph Samarias, Esq.); (vii) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (viii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Amy Caton, Esq., Lauren Macksoud, Esq., and Jennifer

Sharret, Esq.); (ix) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.); (x) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (xi) the members of the Official Committee of Unsecured Creditors Holding Asbestos Related Claims; and (xii) Akerman Senterfitt LLP, attorneys for Zinn Company, Inc., 335 Madison Avenue, 26th Floor, New York, New York 10017 (Attn: Keith N. Costa, Esq. and Martin Domb, Esq.), so as to be received no later than **May 12, 2010 at 4:00 p.m. (Eastern Time)** (the "**Objection Deadline**").

Dated: New York, New York
May 5, 2010

s/ *Keith N. Costa*

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